R9372-2

Refugee Reports

A News Service of the U.S. Committee for Refugees
1025 Vermont Avenue NW, Suite 920 Washington, DC 20005 (202) 347-3507

Volume XI, Number 7 July 20, 1990

HIV/AIDS: EFFECT OF U.S. POLICY ON REFUGEES AND OTHERS SEEKING TO ENTER OR STAY IN THE UNITED STATES

The boycott of the Sixth International Conference on AIDS in San Francisco by numerous international organizations, governments, and AIDS service providers focused worldwide attention on the U.S. policy that bars individuals with the Human Immunodeficiency Virus (HIV), the virus that causes AIDS, from entering the United States--unless they are granted a special waiver. The boycott arose because HIV-positive individuals planning to attend the San Francisco conference could be denied entry to the United States. However, it also focused attention on the effects of the U.S. policy on refugees, asylum seekers, legalization applicants, and immigrants with AIDS or HIV.

The policy has been in effect since December 1987, after Congress instructed the Center for Disease Control (CDC) to add HIV infection to the "dangerous contagious diseases" that exclude persons from entering the United States (see Refugee Reports Vol. VIII, No. 9). The International Red Cross, the European Parliament, the governments of Switzerland and France, and the National Gay and Lesbian Task Force were among more than 85 groups that joined the boycott.

Following intense international pressure, the U.S. Immigration and Naturalization Service (INS) instituted new procedures that made it possible for aliens to apply for a special 10-day visa to enter the United States specifically to attend approved scientific, professional, or academic conferences without being questioned about their HIV status.

The INS 10-day visa was widely criticized, however. One conference organizer said, "Clearly, no one would choose to get...[the] 10-day visa unless they were infected." The Whitman Walker Clinic, Washington, D.C.'s largest AIDS services provider, called the new procedure "a patronizing step and a completely unacceptable solution."

The World Health Organization (WHO), the UN agency that has been at the forefront of the global fight against AIDS, has also been a critic of the U.S. testing and exclusion policy. According to a recent Human Rights Internet (HRI) study on AIDS, Double Jeopardy--Threat to Life and Human Rights, Discrimination Against

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Persons with Aids (see Resources), the WHO opposes the imposition of travel restrictions on people with AIDS or HIV. The HRI report says that WHO considers such restrictions "ineffective, costly, and discriminatory."

Policy Affects Individuals Both outside and within the United States The U.S. screening policy affects groups both overseas and in the United States, including:

° ***Immigrants*** All potential immigrants to the United States over the age of 15 are tested for HIV in their country of residence. If an applicant tests positive, he or she is denied entry to the United States. According to the State Department, in FY 1989, 412,301 immigrants entered the United States. Some 4,090 individuals were initially deemed ineligible for entry because they had one of the listed contagious diseases, but 3,233 of them overcame their ineligibility and were among those admitted. Another 837, however, were denied entry. Since the State Department says it does not keep HIV-specific statistics, it is not possible to know how many of those 837 individuals were denied entry because of HIV.

° ***Refugees*** Refugees overseas who are seeking resettlement in the United States are tested after they are approved for resettlement. If they test positive, they are denied entry, although they can request a waiver of the decision. There is concern among some refugee advocates, however, that refugees who test positive may not be receiving information regarding the existence of waivers.

According to the HRI report, the United States was the first country to adopt a policy requiring mandatory HIV screening of all applicants for refugee resettlement. Since then, other countries, including Australia, have followed the U.S. lead.

° ***Asylum Seekers*** Individuals who are already in the United States and who apply for asylum are not tested at the time of application. They are tested, however, when they seek to adjust their status to permanent resident. If they then test positive, they are denied permanent resident status, although they can also request a waiver. Little information is available on persons in this category. There has been at least one waiver application filed in California by an HIV-positive asylee seeking to adjust, and reportedly several other HIV-positive asylees seeking adjustment also plan to apply for waivers.

° ***Legalization Applicants*** Persons residing in the United States who applied for legalization under the amnesty provision of the Immigration Reform and Control Act (IRCA) of 1986 are also tested, and if found to be positive are denied legalization, though they too can apply for waivers.

° ***Cuban and Haitian Entrants*** As with asylees, Cuban and Haitian entrants are tested when they seek to adjust to permanent resident and can be denied adjustment if found to be HIV-positive. Haitians in particular have faced difficulties throughout the 1980s as a result of their having been identified by the CDC as a separate "at risk" group between 1982 and 1985 (see Refugee Reports, Vol. VII, No. 9). Even now, Haitians complain about what they describe as discriminatory policies, such as the Federal Drug Administration's (FDA) ban on Haitians donating blood. On April 20, 1990, tens of thousands of Haitians demonstrated in New York City against the FDA ban.

° ***Temporary Visitors*** Temporary visitors (including tourists) are asked if they have a contagious disease when they apply for a visa to enter the United States. If they answer affirmatively, they may be denied a visa. Even if they have a visa, visitors arriving in the United States "are subject to testing or medical exclusion if they are suspected of being HIV positive," according to a Refugee Policy Group (RPG) paper, Contagious Diseases and Refugee Protection: AIDS Policy in the United States (see Resources).

What Happens to Refugees Who Test Positive? The United States began mandatory HIV-testing of refugees accepted for resettlement in December 1987. A total of 69 refugees tested positive for HIV out of the 163,356 who were accepted for resettlement between the time mandatory testing began until December 31, 1989, according to the CDC.

It is not known what has happened to those 69 refugees (presumably more now, since that figure was for the end of 1989). Only two have applied for waivers. Both the INS and the State Department's Bureau for Refugee Programs told Refugee Reports that

they do not keep records that indicate where the 69 refugees who tested positive are.

The HRI report gives an example of the effects of the U.S. policy on the family of one of the two refugees known to have requested waivers. After the family was accepted for U.S. resettlement, they were tested for HIV. HRI said, "The wife was found to be HIV-positive and thereby excluded from resettlement. The asylum country in which the family resided refused to keep them permanently, and the husband and children resettled in the United States." The wife remains in Africa. Her waiver application is still pending.

In an April 1988 statement before the President's Commission on AIDS, the State Department's Bureau for Refugee Programs expressed concern about HIV-positive refugees. A BRP official told the commission, "Refugees are not like prospective immigrants. If an immigrant tests positive for AIDS virus, he remains a citizen of his country with recourse to its institutions.... It is different for refugees. Refugees exist in tenuous circumstances in their temporary homes."

Refugee advocates worry about the fate of refugees who test positive and are then denied U.S. admission. Kate Bond, HIV program director at the Indochinese Community Center in Washington, D.C., told Refugee Reports, "We are concerned that because they are refugees they will not receive even the limited medical treatment and services that may be available to local people." She added, "They are likely to be ostracized, and the additional stress that places on them could have an immediate detrimental effect on their medical condition."

UNHCR Says Screening Refugees Not Justifiable The UN High Commissioner for Refugees (UNHCR), in its May 1988 guidelines on refugees and AIDS, says, "In every refugee situation in which AIDS or HIV infection is an issue, both human rights and protection principles oblige States and UNHCR to cooperate in the avoidance of individual tragedy. This involves recognition of the fact that exclusion is no solution, and that responses must be geared to the dual objectives of combatting the disease and protecting the refugee."

UNHCR stresses that refugees are not a group particularly at risk for contracting AIDS, and that the number of refugees known to be HIV-positive is extremely low. RPG's report adds, "The underlying assumption of the [U.S. screening] policy--that refugees carry AIDS--is erroneous and dangerous and undermines fundamental principles of refugee protection."

UNHCR is concerned that restrictions regarding HIV-positive refugees may affect not only resettlement, but also first asylum and voluntary repatriation. It has called on countries with restrictions on the entry of HIV-positive persons (such as the United States) to grant waivers automatically in the case of refugees. "Without systematic waivers," UNHCR says, "established first asylum and transit practices will be subverted by the apprehensions of receiving countries. Lives will be lost, for example, through failure to rescue at sea when disembarkation schemes premised on resettlement guarantees collapse because of third country unwillingness to accept those with HIV infection."

Catch 22 for HIV-Positive Refugees in Southeast Asia Thailand has enacted a law that prohibits HIV-positive refugees from residing in that country. Other refugee-hosting countries could follow suit. That raises the concern that HIV-positive refugees who become ineligible for resettlement due to restrictions imposed by resettlement countries like the United States may then be at risk of *refoulement* (forced return).

UNHCR and the International Organization for Migration (IOM) have expressed strong concern about such a possibility. The two organizations have said, "Detention, deportation, or *refoulement* of a refugee because of a disease is, as for any other arbitrary reason, intolerable." Meanwhile, according to HRI, Vietnam has passed a law that bars Vietnamese citizens who fled to Hong Kong--and possibly those who fled to Thailand as well--from repatriating to Vietnam if they are HIV-positive.

HIV-positive refugees, excluded from resettlement, ineligible to remain in a country of first asylum, and barred from returning to their homeland would thus be caught in a tragic "catch-22" situation.

For Asylum/Legalization Applicants in U.S., Effect of Testing Positive "Devastating" It is not only refugees and immigrants

overseas who are affected by the U.S. policy. Dinah Wiley, staff attorney at the Whitman Walker Clinic, says that for legalization and asylum applicants already living in the United States who test HIV-positive, the effects are "absolutely devastating."

"A kind of hopelessness sets in," Wiley told Refugee Reports. "For many, potential problems regarding their immigration status are of even greater concern than even their HIV status. Many will forego medical and other services rather than risk coming to the attention of immigration authorities," Wiley added.

Legalization Applications from HIV-Positive Individuals Often Denied Legalization applicants who test HIV-positive are able to request a waiver. When HIV was added to the list of contagious diseases that are grounds for exclusion in 1987, the same criteria that applied for granting waivers in the case of other grounds of exclusion became applicable to waivers for HIV: family unity, humanitarian purposes, and public interest. However, in a March 2, 1988 memo, INS stated that, to be granted waivers, HIV-positive applicants would also have to establish that: "(1) The danger to the public health of the United States created by the alien's admission to the U.S. is minimal, (2) the possibility of the spread of the infection created by the alien's admission to the U.S. is minimal, and (3) there will be no cost incurred by any level of government agency of the U.S. without prior consent of that agency."

An INS spokesman told Refugee Reports that the INS central office has considered 154 legalization applications from individuals who have tested HIV-positive. Of those, INS said that 8 have been granted waivers, the legalization applications of 35 have been denied, and the applications of sixteen others are pending further information. No decision has been made on the remaining 95 applications.

Ignatius Bau, of the San Francisco Lawyers Committee for Urban Affairs, has compiled further information on the INS decisions, based on copies of INS certified decisions that were made available to the American Immigration Lawyers Association (AILA). Bau found significant differences in approval rates in the four INS regions. In the western region, the approval rate is 83 percent, whereas in the eastern region, the approval rate is only 5 percent.

According to Bau, "Applicants who were granted waivers generally had legal representation, citizen or permanent resident family members, proof of health insurance, and documentation." These included affidavits by the applicants that demonstrated

LEGALIZATION APPLICANTS AND THE HIV TEST: TWO PERSONS' EXPERIENCES
(Note: Names have been omitted to protect confidentiality.)

Ms. B____, a 36-year-old European legalization applicant who has lived in the United States since 1979, went to a private doctor from the INS list for the required HIV blood test. Several days later, a nurse called Ms. B____ at work and told her that the doctor wanted to speak with her because she had AIDS.

Ms. B____ was emotionally distressed the day she went to the doctor's office. When she arrived, a nurse paged the doctor on the intercom, saying, "The woman with AIDS is here." The doctor then told Ms. B____ that she would be deported--information that was factually incorrect.

Mr. R____, a South American legalization applicant who has lived in New York since 1980, went to a New York clinic for his required blood test. He did not understand that he was being tested for HIV, and the clinic did not give him any information about the test. When he returned for the results, Mr. R____ was told he was HIV-positive and given a sealed envelope to send to the INS.

Mr. R____ became depressed. He did not submit his test results to the INS because he thought his application would be denied. Mr. R____ contacted the Immigration Hotline, which informed him about the availability of waivers and referred him to a counseling center. Some time later, when a counselor called Mr. R____ at work to set up an appointment, the counselor was told that Mr. R____ had resigned his job and left no information about where he could be reached.

their knowledge of their HIV infection and enrollment in educational, counseling, or medical program, and affidavits from friends giving good character recommendations or offering financial support."

Among the 37 denials that Bau examined, 21 had not filed a waiver request, 7 others filed waiver requests without any evidence attached, and 9 filed waiver requests with insufficient evidence. The principal reasons given by the INS's Legalization Appeals Unit for denials based on waiver requests with insufficient evidence were: no proof of health insurance; no proof of applicant's involvement in counseling or medical programs; and no information on the applicant's employment status or ability to meet future costs.

Bau expressed concern about the basis of INS's denials. "It seems that the INS is ignoring the three statutory criteria and relying solely on its own three criteria to deny HIV waiver applications," he told Refugee Reports. "Denials are especially questionable when the applicant has a U.S. citizen spouse or children, which presents a *prima facie* case for granting the waiver on family unity grounds," Bau added. In 5 of the first 37 INS denials, the applicant had a U.S. citizen spouse or children.

As with other applicants for legalization whose applications are rejected, HIV-positive applicants who are denied waivers are not deported. However, they remain undocumented and may therefore go underground, shunning medical treatment to avoid future detection by immigration authorities.

Recent Developments

CPA'S FIRST ANNIVERSARY COULD BE ITS LAST

Last summer in Geneva, 56 nations agreed on a plan to resolve, or at least ameliorate, the 14-year-old crisis of the boat people, which has seen more than 1.2 million Vietnamese leave their homeland in search of temporary asylum and eventual permanent resettlement. That agreement, known as the Comprehensive Plan of Action (CPA), committed its participants to a set of interlocking initiatives: temporary refuge and screening for all Vietnamese asylum seekers, resettlement for those screened in as refugees, and repatriation for those screened out as nonrefugees.

While the CPA has achieved some successes, observers say, particularly in terms of resettlement of "longstayers" in the refugee camps, and while regional boat arrivals have declined by more than 25 percent in the last year, first asylum in Southeast Asia is facing what may be its gravest crisis in more than a decade. Malaysia has pushed back more than 8,300 boat people since May 1989, and the rest of the asylum countries in Southeast Asia have threatened to follow suit if, by July 1, the United States failed either to agree to the involuntary return of the screened-out or to support a holding center for them, pending their eventual voluntary return to Vietnam.

The crisis has prompted a round of shuttle diplomacy by new UN High Commissioner for Refugees, Thorvald Stoltenberg, which took him to several asylum countries in Southeast Asia and to the United States. On June 26, Stoltenberg met with President Bush, seeking to persuade him, as one source told Refugee Reports, that "returning people to Vietnam is better than returning them to sea."

President Bush "restated the U.S. position in support of first asylum in Southeast Asia and against involuntary repatriation to Vietnam under current conditions there," according to a White House press statement. The Administration, furthermore, has rejected the idea of a holding center on U.S. territory and has made no commitments on a regional holding center, except to say that it supports the idea "in principle."

So, although the July deadline has slipped by without incident, at least so far, the threat remains that the offer of asylum--and, along with it, all other commitments to the CPA--could be revoked at any time, leading to pushbacks throughout the region and hundreds if not thousands of deaths at sea.

"While there is a great deal of debate both within the Administration and within the refugee advocacy community on just how the U.S. should respond," said Rep. Stephen J. Solarz (D-N.Y.) to open a June 21 congressional hearing on the CPA, "there can be no disagreement on one crucial point: that time is not on our side."

House Hearing on CPA Examines U.S. Options Appearing before the House Subcommittee on Asian and Pacific Affairs, which Solarz chairs, Reps. Chester G. Atkins (D-Mass.) and Hamilton Fish, Jr. (R-N.Y.) both endorsed the need for consensus on involuntary repatriation as the only way to preserve first asylum in Southeast Asia.

"I am here to recommend to this committee that you support efforts to send a clear signal to the world community and to our government," said Atkins, "that we are prepared to adjust and to make accommodations on involuntary repatriation in order to restore first asylum. I wish that there were some alternative to that."

Atkins and Fish introduced a resolution (H.Con.Res. 343) calling on the United States to accede to "orderly repatriation provided that there is in place in each country of asylum a credible screening program for determining refugee status; that such a program includes a sound appeals process; and that asylum seekers are well apprised of their rights and options."

The resolution also required that Vietnam gives "every assurance that the returning citizens are not treated harshly; that they are no longer deemed criminals under Vietnamese law; and that returnees are granted full access to representatives of [UNHCR] and other appropriate international organizations."

Both congressmen expressed reservations about a holding center. Fish called it "no more than a Band Aid." Atkins said, "I fear that...establishment of a holding center would just exacerbate the problem because it will create...a magnet for more people to come out on the high seas, more people to risk their lives, [and] more human tragedy."

U.S. Repeats Opposition to Involuntary Return, Concerns on Holding Center Ambassador Princeton Lyman, director of the Bureau for Refugee Programs in the Department of State, said that a holding center on U.S. territory is not a solution "because the basic hope of people who are leaving is to be resettled. And resettling in the United States is very attractive. The word that the United States was going to take the screened out and put them on U.S. territory, in my view, would act as a magnet."

As for a holding center in the region that was not on U.S. territory, Lyman said, "We have looked and are looking at all aspects" of that, but "all the first asylum countries have said no" to housing such a facility, as have France and Britain. Lyman estimated that a holding center might need to accommodate anywhere from 20,000 to 50,000 people.

Lyman offered a positive view of the voluntary repatriation effort, noting that more than 3,000 Vietnamese have returned home voluntarily since March 1989, most of these from Hong Kong, and 1,800 more are in line to go back. Furthermore, Lyman said, "UNHCR has been doing a credible job of monitoring the returnees. They report having visited 25 percent of all returnees, including 50 percent of those who have returned to southern Vietnam. They have investigated every report of harassment or persecution, and found none."

At this point, Solarz interrupted with a question. "Mr. Lyman, forgive me, but if the record on monitoring is as good as you say it is, if not a single person who has been sent back has been punished or penalized, then why are you opposed to the involuntary return of people who have been screened out?"

"Because the process of involuntary return," Lyman replied, "requires you to take people who for a variety of reasons--perhaps their own fears of persecution and perhaps for other reasons--refuse to go and must be either forced back or sent back under threat. We do not think that, under the conditions in Vietnam, we ought to do that to people who have risked their lives to come out."

Hong Kong Screening Program under Scrutiny As of June 30, 1990 there were 46,198 Vietnamese in Hong Kong who arrived after June 16, 1988 and are subject to screening. Of these, 12,102 had been interviewed by Hong Kong immigration officials. A total of 1,921 were screened in and are eligible to seek resettlement in another country. The remaining 10,933 have been screened out. Including those screened in following an appeals process, Hong Kong's approval rate is about 15 percent.

"There have been a lot of problems in the Hong Kong [screening] program," Lyman said. "We have been deeply concerned about the shortfalls and inadequacies in that

Following are excerpts from an exchange between Rep. Stephen Solarz and Ambassador Princeton Lyman at a June 21 hearing before the House Subcommittee on Asian and Pacific Affairs.

Solarz:...We are confronted with the question of what is the lesser of two evils, because I do not like involuntary repatriation; I do not like it for Haiti, I do not like it for Cuba, I do not like it for El Salvador, I do not like it for Guatemala, and I certainly do not like it for Vietnam.

But we have some reason to believe that if we do not go along with this, that countries may very well abandon the principle of first asylum, and then, we know for sure that some will die. We do not know whether it is a dozen, a hundred, or a thousand, but some will die. And if we stick by this position, to some extent, their deaths will be on our conscience.

Now set against that is our distaste for the concept of involuntary repatriation with respect to Vietnam. But in view of the fact that you have said that all of those who have been returned to Vietnam appear not to have been penalized... in view of the fact that Vietnam appears ready to accept any reasonable monitoring arrangement, in view of the fact that the screening procedures, whatever their previous deficiencies, according to your testimony, now seem to be such that at the end of the day, anybody who feels aggrieved can go to the UNHCR, and the UNHCR has the ability to separate them out as a refugee--in view of all those facts, and in view then of the fact that we are talking about the involuntary repatriation of people who are deemed to be economic migrants, why do you believe that it is a lesser evil to face the very real possibility that Vietnamese boat people will lose their lives at sea rather than to return Vietnamese judged as economic migrants, and to send them back to Vietnam, where we can be reasonably confident that they are not likely to be persecuted for having left in the first place?

Lyman: Mr. Chairman, this is a very difficult issue, and nobody pretends to have any simple answers to it, and it poses some very, very difficult choices, but it is not all easy on the other side, either. If you tomorrow agree on the U.S. withdrawing its objections to involuntary return, there are a lot of consequences there if you think about it. What would it be like to force people back to Vietnam? We saw what it took [for Hong Kong] to send 51 women and children back in December. Three hundred security guards took them back. How much of this do we want to watch? How much of that would have to take place?

Second, is this really a solution? Everybody talks about it in the ASEAN countries and Hong Kong as a solution. But Vietnam has said, "We won't take anybody who is forced back."...What happens if countries go down that path and find that it is impractical, and then say, "Okay, now we've got to abandon first asylum anyway." All I am saying is, it is not the panacea that it sounds like, and it has a large moral cost, too.

Solarz: Is it your view that Vietnam will not agree to involuntary repatriation?

Lyman: They have said that they will not agree to forced return.

Solarz: What do they mean by that?

Lyman: That is still unclear, but it means that they do not want 300 security guards for every 50 women and children who come down off the plane...

Solarz: Well, let me just say that if the Vietnamese refuse to accept people who are sent back against their will, the issue becomes a closed issue, and it does not matter whether we are for it or against it.... But the question that confronts us is: should we support it if the Vietnamese say yes?

Lyman: Well, as I said, there are also a lot of moral reasons as to what we would witness if we went along with it.

Solarz: I suppose that nobody witnesses someone drowning at sea, but is that less morally objectionable?

Lyman: Nobody wants to see people drowning at sea, Mr. Chairman, and we are all faced with some terrible choices and dilemmas here. But, I think that before proceeding with, "Okay, let's agree to involuntary return; that'll answer the question," we ought to think about it very carefully....I think that we need time and patience, and that means compromise. That means giving more time for the present program to work, accepting the screened-out for a longer period of time in first asylum countries.

program." Lyman added that "UNHCR has recently noted some improvements," including the decision by Hong Kong authorities to issue written explanations of denials and to permit UNHCR to sit in on appeals.

"Under the existing procedures, is there any reason for anyone to fear that somebody will be forced to return who is genuinely entitled to refugee status?" Solarz asked. "Only if the system does not work as it should," said Lyman. "That is, if UNHCR does not have a staff working and examining each case."

But several private witnesses testifying before the Solarz committee offered more critical views of the Hong Kong screening. Dan Wolf, a Washington lawyer and consultant with Refugees International, interviewed dozens of Vietnamese boat people denied refugee status by Hong Kong and has concluded that the screening procedures "are a ruse designed to discourage new asylum seekers from coming and to pressure those who have come to return to Vietnam."

Wolf cited reports by Amnesty International and the Lawyers Committee for Human Rights, which identified a number of flaws in the screening procedures. These included, according to Wolf's testimony, "inadequate notice, lack of adequate legal advice and assistance, denial of the right to have counsel present during the screening interview, biased and incompetent immigration officers, incompetent and poorly trained interpreters, [and] failure to provide an accurate interview record."

Lionel Rosenblatt, executive director of Refugees International, suggested that if Hong Kong screening were to truly give the benefit of the doubt to the applicant, approval rates would be about 50 percent.

"As long as screening and appeals procedures remain flawed," wrote Arthur Helton, director of the Lawyers Committee for Human Rights, in letters to President Bush and to Stoltenberg, "the possibility looms that genuine refugees will be forcibly repatriated to Vietnam." Responding to the letter, UNHCR's Dennis McNamara, deputy director of the Division of International Protection, cited "very substantial improvements" in the regional screening programs in recent months and said, "We do not agree that the system is so biased or flawed, either in Hong Kong or elsewhere, that there is a real danger today of refugees being forcibly returned to Vietnam."

Several Private Groups Call for Holding Center "Unless the U.S. offers other assurances to asylum nations that they will not be left holding the screened out indefinitely," Rosenblatt testified, "opposing mandatory repatriation paves the way for refuge to be closed down throughout the region." The alternative, which Rosenblatt said "has many disadvantages, but is better than any other new proposal on the table," is a holding center for the screened out.

According to Rosenblatt, a holding center "would permit the screened out a subsistence life-style, until they feel that conditions at home permit voluntary repatriation or until the international community can agree that conditions in Vietnam permit mandatory return and that satisfactory safeguards are in place. Special care would have to be taken to avoid creating a pull factor."

Support for a holding center was echoed by other private witnesses, including Wolf; Robert DeVecchi, executive director of the International Rescue Committee; Dawn Calabia, associate director for refugees of Migration and Refugee Services/U.S. Catholic Conference; and Thang Nguyen, director of the Boat People S.O.S. Committee.

Nguyen rejected the idea that a holding center would create a magnet effect. The screened out population placed there "would be well-informed that the only available options are continued stay in the holding center or return to Vietnam," Nguyen said. "We doubt that the prospect of indefinite confinement would be a great incentive for flight."

Nguyen also said that he believed a suitable location could be found "if the U.S. government commits itself" to the idea. "In any event," he said, "the difficulty in identifying a suitable location is hardly a persuasive reason for not making every effort to do so."

"I understand your point about the desirability of a holding center and the failures by the Administration to make a greater effort," Solarz told Nguyen, "but if it turns out that we cannot get a holding center anymore--I gather from what you say that even if you were convinced that other countries would turn away from first

asylum, you would still be against involuntary repatriation?"

"Personally, yes," Nguyen said. "I cannot speculate on the reaction of the Vietnamese American community in general. I suspect that there might be no consensus on that issue."

"I frankly think that the holding center idea is simply going to be 'jawboned'," said Court Robinson, policy analyst for the U.S. Committee for Refugees. "I do not see the commitment there on the part of the U.S. government." Meanwhile, Robinson said, "the terms of preserving first asylum get worse. The lack of clarity on the part of would-be asylum seekers remains, and as more boats go out, the risks of death on the water--not just from pushbacks, but from piracy and the inherent risks of sea travel--go up. So lives are lost even as we talk about a holding center."

FINAL ASYLUM REGULATIONS FINALLY APPROVED

Long-awaited regulations establishing a permanent procedure to determine asylum claims in the United States were signed on July 18 by Attorney General Dick Thornburgh.

"The regulations that I've signed today will ensure that those who seek the protection of this country encounter a fair and sensitive legal process, faithful to the intent of Congress, and one that generates uniform and consistent results," said Thornburgh.

Under the new system, a corps of asylum officers will be created within the Immigration and Naturalization Service (INS), and will be assigned exclusively to adjudicate asylum applications.

INS Commissioner Gene McNary said, "In cooperation with the Department of State, the INS asylum officers will receive specialized training in the standards to be applied in making asylum determinations, as well as worldwide country conditions and international law."

McNary said that the new asylum officers would be specialists, as opposed to the current INS examiners, who act as "general practitioners," adjudicating asylum claims, along with other duties.

McNary also said that the regulations call for the creation of an INS documentation center for the collection and dissemination of information on worldwide human rights conditions. McNary said that the documentation center would be open to the public "within limits."

McNary estimated that the changes in the INS adjudicatory procedure would cost between $7 and 9 million annually, and that the corps of 70 to 90 asylum officers and the documentation center would be in place by April 1, 1991.

Asylum Regs: A Long Time in the Making The final regulations have been years in the making. Since the enactment of the Refugee Act of 1980, asylum adjudication has been governed by an interim rule of June 2, 1980. Proposed regulations of August 28, 1987 essentially would have excluded immigration judges from the asylum process (see Refugee Reports, Vol. VIII, No. 9). Following a storm of protest, those proposed regulations were withdrawn and new ones were proposed on April 6, 1988 that maintained the role of immigration judges, and allowed asylum seekers denied by the INS to raise their claims *de novo* in deportation or exclusion proceedings (see Refugee Reports, Vol. IX, No. 4).

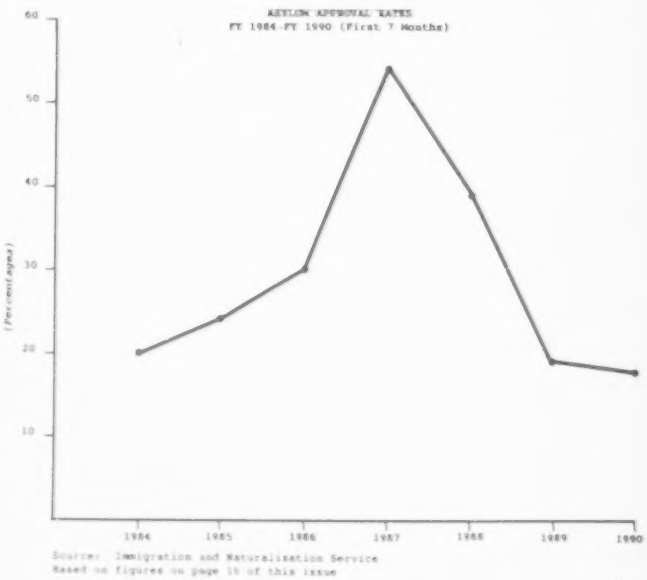
After April 1988, however, the Justice Department remained officially silent on the regulations for more than two years. During that time, other groups, including the Administrative Conference of the United States (a federal agency charged with improving the procedures of federal agencies), proposed reforms in the asylum system (see Refugee Reports, Vol. XI, No. 3).

A Specialized Asylum Function within the INS The major changes incorporated in the new regulations occur within the INS itself --the creation of the corps of asylum officers. Fewer changes are evident with respect to INS's relations with the State Department and the rest of the Justice Department, including the Executive Office of Immigration Review.

The new rule, which becomes effective on October 1, provides for continued adversarial adjudications of asylum by immigration judges in deportation and exclusion proceedings, but provides for a nonadversarial hearing by the INS officers prior to the institution of proceedings.

In supplementary information provided by the INS on the new regulations, the agen-

cy stated that "many comments on the previously published rules have raised the objection that the adjudication of asylum cases will remain within INS, since the Service is also responsible for enforcement functions. This regulation creates an asylum adjudications function which is separate from INS' enforcement functions, the Asylum Officers will...deal only with asylum cases."



Specific Provisions of Asylum Regulations

Highlights of the 77-page regulation include the following provisions:

° If the asylum applicant's testimony is credible in light of general conditions in the applicant's homeland, his testimony may be sufficient to sustain his burden of proof without corroboration.

° It is not necessary for the applicant to prove that he would be singled out if he can establish that there is a pattern or practice of persecuting a group of persons similarly situated, and that he can establish inclusion or identification with that group.

° The INS is required to make asylum application forms available to aliens in custody who request asylum or express a fear of persecution, and provide, where available, a list of persons or groups who can assist the alien in preparing the application.

° Aliens seeking asylum who are detained by the INS will be given expedited consideration, where possible.

° Employment authorization is mandated for applicants who are not in detention, whose claims are determined not to be frivolous. "Frivolous" is defined as "manifestly unfounded or abusive."

° Employment is authorized for a period not to exceed one year, and will remain valid for at least sixty days after an asylum officer's denial. It can be renewed if the denied applicant shows that he or she is pursuing administrative or judicial review. Employment authorization is automatically given or extended upon a grant of asylum.

° Asylum interviews shall be nonadversarial and, at the request of the applicant, conducted in private. The applicant may have counsel or a representative and submit affidavits of witnesses. Counsel's role is limited to making a statement on the evidence at the close of the interview.

° An unexcused failure to appear for a scheduled interview may be presumed to be an abandonment of the asylum application.

° Asylum officers must state the reasons for denials and assess the applicant's credibility.

° The State Department's Bureau of Human Rights and Humanitarian Affairs (BHRHA) has the option of commenting on asylum applications, but if no comment is received within 60 days, the asylum officer or immigration judge may decide the claim without a BHRHA response.

° Asylum shall be denied if the alien has been convicted in the United States of a particularly serious crime, is a danger to the security of the United States, or has been firmly resettled in a third country.

° There are two exceptions to firm resettlement as a mandatory ground for denial: 1) if entry into the third country was a necessary consequence of flight, and the applicant only remained there long enough to arrange onward travel; or 2) if his conditions of residence in the third country are substantially restricted.

° Where there are mandatory grounds for denial of asylum, immigration judges need not hold evidentiary hearings on claims of persecution in exclusion or deportation hearings.

° If an applicant is denied asylum in the exercise of discretion, but granted withholding of deportation, the asylum decision shall be reconsidered, as well as other reasonable alternatives for family reunification.

° An alien denied asylum who was maintaining legal nonimmigrant status at the time of his filing may continue to be restored to that status.

° Asylum or withholding of deportation may be revoked due to changed country conditions, fraud, or if the alien is found to have persecuted others, been convicted of a particularly serious crime in the United States, committed a serious nonpolitical crime outside the United States, or represents a danger to U.S. security.

Asylum Advocates Generally Take Wait-and-See Posture Toward New Procedures Arthur Helton, director of the Refugee Project of the Lawyers Committee for Human Rights, called the new rule "a constructive step toward meaningful implementation of the Refugee Act of 1980." He said that the documentation center was "quite promising" and the elimination in gaps for work authorization was "a very positive development."

Helton was not as happy with the limitations on evidentiary hearings for those facing mandatory denials. "This will undoubtedly be the subject of litigation and further proposals for reform," he said.

Kathleen Sullivan, an attorney with the American Council for Nationalities Service, also expressed concern about those facing mandatory denials, saying that the phrase "particularly serious crime" was "overbroad", and that there needs to be "a balancing between the seriousness of the crime and the level of persecution feared." She said that while the regulations go a long way toward improving the process generally, they nevertheless "fail to protect those most in need of protection."

Carol Wolchok of the American Bar Association took particular issue with the limited role of attorneys in interviews before INS asylum officers. "This regulation is unacceptable," she told Refugee Reports. "Lawyers need to have a meaningful role in the process. To conduct hearings in that manner is a disservice both to the applicant and the INS."

Helton observed that there is "no diminishment of the role of counsel" in the new rule, although, he said, "these rules do not address the need to enhance the role of counsel, particularly for indigent asylum seekers."

David A. Martin, professor of law at the University of Virginia, who wrote the report upon which the Administrative Conference made its recommendations for asylum reform, said, "The greatest disappointment from the standpoint of the Administrative Conference is that the regulations retain two rounds of adjudication."

Martin said that he would have preferred to have seen the corps of asylum adjudicators housed in the EOIR as opposed to the INS. But, he said, the reforms of the INS adjudicatory framework in the regulations "could lay the groundwork for more thoroughgoing reforms."

Martin said, "We should pull back from immediate harsh criticism" and "wait and see" how the rule is implemented. The bottom line, he said, is that "a better structure could bring a more even-handed application of standards to garden-variety asylum applicants, who do not have criminal episodes in their history."

INS CONSOLIDATES SHELTERS IN SOUTH TEXAS

by Emily Schwartz

The Immigration and Naturalization Service (INS) stopped holding family groups of asylum seekers at the Brownsville, Texas shelter on June 12 in response to decreasing numbers of Central Americans entering the United States with children seeking asylum.

Shelter staff shuttled approximately 75 family members 20 miles away to a site in San Benito, a large warehouse that now holds 200 asylum seekers.

The Brownsville shelter opened in January 1989 at a time when refugee families "were living in abandoned buildings and the government didn't seem to have any plans" to accommodate them, according to Bob Vessey, director of Disaster Services of the American Red Cross (see Refugee Reports, Vol. X, No. 1, 2, and 5).

By late 1989, the Red Cross had gradual-

Emily Schwartz worked as a paralegal with ProBAR in Harlingen, Texas in May 1990.

ly handed control of the shelters to another private group, called Texas Key, which won a contract with the Justice Department to run the facilities. Like its predecessor, Texas Key never built a kitchen in San Benito. Since April 1989, staff have bussed food from Brownsville to San Benito.

Medical and administrative staff will remain in Brownsville, where legal workers must obtain a pass to visit refugees at the San Benito shelter. The INS will take families caught wading across the Rio Grande late at night to Brownsville for initial processing, and transfer them to San Benito the next day.

Immigration attorney Linda Yanez says that she would have moved San Benito's refugees to Brownsville. "In San Benito, there's no running water or kitchen. The place is a warehouse, or an oven. There's nothing to do. Over here in Brownsville there were organized activities, and they weren't transferred." Yanez added, "I don't see how it's cost-effective to bring the food three times a day."

While legal workers and immigration officials dispute the consolidation procedure, no one denies that fewer families need shelter. "We were running in the 800s this time last year," said Ken Leutbaecker, deputy associate director for Immigration and Refugee Affairs in the Community Relations Service, the Justice Department's agency that contracts the shelters.

Nicaraguans made up 64 percent of last June's shelter population and currently comprise 54 percent of the residents in San Benito facilities. The marked difference in the number of sheltered families reflects changes in the Nicaraguan refugee flow more than any general trend in Central American political asylum applications.

At the INS Port Isabel Service Processing Center in Los Fresnos, Texas, overall numbers of detainees have dropped to about 800 from 1,500 last year. Salvadorans now outnumber Nicaraguans, who comprised the largest group detained there in the fall of 1989.

SENATE COMMITTEE HOLDS HEARING ON PROPOSED REDUCTIONS IN SLIAG FUNDING

The Administration's proposal to cut the funds available to states under the State Legalization Impact Assistance Grants (SLIAG) program was roundly criticized by state and local government officials, who claimed that the cuts in essence represented a breach of contract by the federal government. Administration witnesses defended the proposed cuts, and state and local government officials condemned them, at a June 27 hearing on SLIAG held by the Senate Appropriations Committee's Subcommittee on Labor, Health and Human Services, and Education.

SLIAG is a provision of the Immigration Reform and Control Act (IRCA) of 1986, which also provided for the amnesty program, under which more than 3 million aliens have applied for legal status in the United States. SLIAG provides reimbursement to states and localities for expenditures incurred in offering public health, education, and public assistance to aliens participating in the amnesty program. Congress appropriated $4 billion for the SLIAG program ($1 billion per year for four years, to be spent over a seven-year period, FY 1988-FY 1994). Of that, $500 million was expected to be taken off the top to reimburse the federal share of medicaid costs and to pay for federal administrative costs, leaving $3.5 billion for reimbursement to states and localities.

According to information provided by the American Public Welfare Association (APWA), the proposed FY 90 appropriation reduced the $1 billion slated for SLIAG by $555 million, with a provision that these funds would be restored in FY 1992. President Bush's budget proposal for FY 91 calls for a $537 million reduction of the $1 billion SLIAG appropriation and seeks to eliminate the provision for repayment in FY 92 of the $555 million taken from SLIAG in FY 90, for a total reduction of $1.092 billion.

<u>Senators from Most Affected States Decry Reductions</u> Senator Pete Wilson (R-Calif.) opened the hearing by saying said that he would "strenuously object" to the federal government cutting back on funds it had promised to the states. "A deal is a deal," Wilson said.

Wilson told the subcommittee that California, which received 58.1 percent of all SLIAG funds in FY 89, is home to some 1.6 amnesty recipients, 850,000 of whom live in Los Angeles county; that over 20 percent of all hospital admissions in L.A. county are

legalized aliens (as persons who have regularized their status through the amnesty program are called); and, that one of every 200 babies born in the United States is born to an amnesty applicant in just one Los Angeles County hospital.

"Cutting SLIAG funds does not cause the demand for services or the related costs to disappear," Wilson said. "It merely shifts the burden--unfairly and inappropriately--to a few states and local governments." Wilson added, "Especially in the area of immigration and refugee policy, the federal government is backing out of its partnership with the states."

Reiterating that theme, Sen. Bob Graham (D-Fla.) said that at issue is the partnership between the federal government and state and local governments. Based on their experience with SLIAG, Graham said, states would probably be reluctant to enter into such partnerships in the future. Graham told the subcommittee that had the funds promised to states under the SLIAG program not been included in IRCA, it is doubtful if states and counties would have agreed to IRCA in 1986.

The National Governors' Association (in a statement submitted for the record) concurred, saying that it was the inclusion of SLIAG in IRCA that "allowed state and local government, specifically governors, to support IRCA." The NGA added, "The reductions in funding during last year's appropriations process and the President's proposed reduction for FY 1991 are inconsistent with...the commitment made by the federal government to the Governors and others in 1986."

GAO, OIG Reports Support FY 1991 Reductions, Recommend Delay in Rescission Sarah F. Jaggar testified for the United States General Accounting Office (GAO), basing her testimony on a study of SLIAG funding requested by Congress in April 1990. Jaggar said, "Almost 90 percent of the federal [SLIAG] funding will go to five states, with California receiving the largest share. Based on estimates obtained from these five states, it appears that costs [incurred by states for providing services to legalized aliens] may exceed $2.4 billion. However, that amount should be sufficient to cover anticipated drawdowns for all states through 1991." The GAO concluded that "Congress could take action on the FY 91 budget similar to that taken last year. That is, it should move $537 million of spending authority to 1992." However, the GAO recommended that "decisions about rescinding the $537 million and the $555 million should be delayed until next year's appropriations process, when better state cost data are available."

The Office of the Inspector General (OIG), which also conducted a study on SLIAG presented at the hearing, went even further in supporting the administration's position. Concluding that "a large appropriation could be an incentive [to states] to excessive and wasteful expenditure," the OIG supported a reduction of the FY 91 appropriation by $500 million and added that "a strong case could be made for further reduction in appropriations, even no appropriation in FY 92."

Opponents Say Reductions Would Affect Services, Burden States According to the APWA, "Any reduction in the [SLIAG] appropriation will put the newly legalized population further at risk; disrupt state planning and service delivery; create a financial burden for states and localities (impacting the entire service population including citizens); and acutely strain the federal-state-local partnership established by SLIAG."

The Administration's rationale for cutting SLIAG funding appears to be based in part on the fact that states have been slow to draw down (claim reimbursement for monies spent) SLIAG funds from the federal government. But, in a statement for the record, the National Conference of State Legislatures (NCSL) said that Congress recognized that draw down would be slow, and that is why it allowed for funds to be spent over a seven-year period. "It is precisely this fiscal design of the SLIAG fund that has eroded the Congressional commitment to fully fund this program," the NCSL said.

"Despite the fact that states fully expect to spend all SLIAG funds in the time frame stipulated and are required by IRCA to provide costly services, there appears to be concern that the [current] unspent balance is evidence that additional funding is not needed," NCSL added. "SLIAG is essential for providing needed services to a new population. Cutting funding in this

area will impact service delivery not only for newly legalized persons, but for all recipients of state social service programs," NCLS said.

Update

° In a policy shift, the United States will withdraw recognition of the Coalition Government of Democratic Kampuchea (CGDK), which includes two noncommunist factions and the Khmer Rouge. The United States will also initiate dialogue with Vietnam in an effort to prevent a Khmer Rouge victory in the Cambodian civil war, Secretary of State James A. Baker, 3rd, announced on July 18, following a two-hour meeting in Paris with Soviet Foreign Minister Eduard Shevardnadze.

"One of the major objectives of our Administration," Baker said, "was to see the withdrawal of Vietnamese forces from Cambodia. We have now seen that accomplished and it is very important, we think, to do what we can to prevent a return to power by the Khmer Rouge.... In keeping with that objective, we have determined that we will open a dialogue with Vietnam about Cambodia, we will be prepared to enhance our humanitarian assistance to Cambodia, and we will be prepared to and will in fact change what has been our policy regarding the seat at the United Nations which has been held" by the CGDK.

In next month's lead, Refugee Reports will examine this important development, particularly the possible impact on Cambodian refugees and internally displaced persons.

° The first international meeting of the follow-up committee of the International Conference on Central American Refugees (CIREFCA) was held in New York on June 27-28, 1990. Some 72 government delegations, 16 international organizations, and 59 private and voluntary organizations (PVOs) attended the meeting. A number of Salvadoran PVOs were prevented from attending, however, because the U.S. Government denied their representatives visas. Both the UN High Commissioner for Refugees (UNHCR) and regional PVOs expressed concern about the United States' exclusion of the Salvadorans.

At the follow-up meeting, reports were presented on the progress achieved in the implementation of the Concerted Plan of Action adopted at the CIREFCA conference held in Guatemala City in May 1989. Funding for an additional 59 projects was also sought from donors at the meeting.

The U.S. representative, Ambassador Princeton Lyman, said that recent developments in Central America--including elections, the demobilization of the Nicaraguan Contras, and peace talks in El Salvador and Guatemala--made it possible for the problems of the uprooted to be tackled to an extent not thought possible last summer. The meeting's president, Arnoldo Lopez Echandi, vice president of Costa Rica, said that while recent developments in the region had encouraged a trend towards voluntary repatriation, not all refugees were likely to repatriate, and the problem of uprooted people still constituted "an urgent challenge."

° On July 10, at least 39 Haitians drowned at sea after their boat was interdicted by the Bahamian Defense Force (BDF) and capsized as it was being towed. Sixty-seven survivors were rescued, and 39 bodies were recovered, according to a July 13 AP report. On that day, the St. Petersberg Times reported that 48 persons drowned in the incident.

° At a press conference on July 18, INS Commissioner Gene McNary said that a memo was being circulated at the Justice Department that would recommend that Liberians be given "sympathetic consideration" for deferred departure on a case-by-case basis. He said that blanket EVD (extended voluntary departure--a withholding of deportation for specific nationalities at the discretion of the Attorney General) was not being contemplated.

Meetings and Conferences

° A workshop on Refugees from the Soviet Union: Screening and Health Care Issues will be held in Milwaukee, Wisconsin on September 13. For further information, contact Marjorie Hurie, Refugee and Immigrant Health Program, Div. of Health, 1 W. Wilson St., Box 309, Madison, WI 53701. (608) 266-9452.

ASYLUM APPLICATIONS FILED WITH INS DISTRICT DIRECTORS BY YEAR

Fiscal Year	Number of Asylum Applications Received	Approval Rate
1984	24,295	20%
1985	16,622	24%
1986	18,889	30%
1987	26,107	54%
1988	60,736	39%
1989	101,679	18%
1990 (7 months)	36,336	17%

Source: Immigration and Naturalization Service; data tabulated by Refugee Reports.

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Basic subscription rate for 12 issues per year: $35.00; Multiple-copy rate: $25.00; Single copies of back issues: $3.00
Co-Editors: Bill Frelick and Virginia Hamilton; Staff Writers: Court Robinson and Hiram A. Ruiz
Distribution Manager: Carolyn Moore; Production Coordinator: Koula Papanicolas
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